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November 12, 2021

Via ECF

Hon. Lewis J. Liman
United States District Court
Southern District of New York
500 Pearl Street, Room 1930
New York, New York 10007-1312

Re: King v. Wang et. al. No. 14-cv-07694 (LJL-JLC)

Dear Judge Liman,

We write on behalf of Andrew and Shou-Kung Wang (“Defendants”). In light of the Court’s ruling on Defendants’ motion in limine with respect to Plaintiff’s new damages theory, and the Court’s proposed schedule for Defendants’ motion to renew their motion for summary judgment, Defendants will simply brief Plaintiff’s anticipated inability to prove RICO injury and damages as part of our motion for a directed verdict after the submission of plaintiff’s case.

Separately, with respect to the Pretrial Conference, we respectfully ask that the Court make a zoom or dial-in available for those members of my litigation team who are not in the New York area. While I can and will attend the conference in person, my team is geographically distributed (Mr. Schmeier is based in Colorado, our paralegal, Ms. Tewson, in Seattle, and our second paralegal, Ms. Farley, in Kentucky), and it would be significantly helpful to our trial preparation if they were able to attend the conference rather than hear about it from me second-hand. We have discussed this with Plaintiff’s counsel and they consent.

Respectfully submitted,

KAMERMAN, UNCYK, SONIKER, & KLEIN, P.C.

By: /s/ Akiva M. Cohen
Akiva M. Cohen
For Defendants

cc. All counsel of record [*via* ECF]